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ATTORNEYS FOR THE DEFENDANTS

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORTH WORTH DIVISION

In re	§	
	§	
DUAL D HEALTH CARE OPERATIONS,	§	Case No. 17-41320-elm-7
INC. d/b/a KEMP CARE CENTER, LLC,	§	
	§	
Debtor.	§	
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In re	§	
	§	
	§	
SPECIALTY SELECT CARE CENTER	§	Case No. 17-44248-elm-7
OF SAN ANTONIO, LLC,	§	
	§	
Debtor.	§	
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SHAWN K. BROWN, TRUSTEE,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Adv. No. 20-04059-elm
	§	
LLOYD DOUGLAS, <i>et. al.</i> ,	§	
	§	
Defendants.	§	
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SHAWN K. BROWN, TRUSTEE,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Adv. No. 20-04060-elm
	§	
LLOYD DOUGLAS, <i>et. al.</i> ,	§	
	§	
Defendants.	§	
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DEFENDANTS' OBJECTIONS TO TRUSTEE'S TRIAL EXHIBITS

TO THE HONORABLE EDWARD L. MORRIS, U.S. BANKRUPTCY JUDGE:

COME NOW Lloyd Douglas, Lloyd Douglas Enterprises, L.C., Brownwood Care Center I, Ltd., D-5 Development, LLC, Sunflower Park Holdings, LP, Whispering Pines Healthcare, L.C., Mt. Pleasant Operators, LLC, Specialty Select Care Center, LLC, Graham Investors Group, LLC, Kemp Investor Holdings, LLC, Kerens Care Center, Inc., and River City Life Care, Inc. (collectively, the "Defendants"),¹ the defendants in the two (2) Adversary Proceedings styled and numbered above, and file this their *Objections* (the "Objections") to the *Plaintiff's Consolidated Exhibit List* (the "Exhibits"), filed by Shawn K. Brown (the "Trustee"), the plaintiff in these Adversary Proceedings.

The Defendants object to the following Exhibits, reserving their right to object to relevance of all of the Exhibits at trial:

<u>Exhibit</u>	<u>Objection(s)</u>
3	Authentication
6	Hearsay; foundation (witness not qualified to opine); failure to timely designate alleged lay expert
7	Hearsay; foundation (witness not qualified to opine); failure to timely designate alleged lay expert
47	Authentication; hearsay
76	Hearsay; foundation
78	Hearsay; no supporting documents
79	Hearsay; no supporting documents
80	Hearsay; no supporting documents
81	Hearsay
83	Hearsay
86	Hearsay; foundation
87	Hearsay; no supporting documents
90	Hearsay; foundation
91	Hearsay; foundation

¹ Various of the Defendants have been dissolved, terminated, or cancelled. They appear herein in a limited matter and to a limited extent under protest, and only to the extent that they have any existence left for the purpose of defending against claims. In no way are they reconstituting themselves or waiving any issue or right by defending the Complaint. They reserve all rights regarding the same.

92	Hearsay; foundation
93	Hearsay; foundation
94	Hearsay; foundation
95	Hearsay; foundation
96	Hearsay; foundation
97	Hearsay; foundation
98	Hearsay; foundation
99	Hearsay; foundation
100	Hearsay; foundation
101	Hearsay; foundation
102	Hearsay
103	Hearsay
104	Hearsay
105	Hearsay
106	Hearsay
107	Hearsay
108	Hearsay; foundation; expert not qualified
109	Hearsay; foundation; expert not qualified
110	Hearsay; foundation; expert not qualified
111	Hearsay; foundation; expert not qualified
112	Hearsay; foundation
113	Hearsay; foundation
114	Hearsay; foundation
115-133	Authentication
157	Hearsay
158	Hearsay; foundation and qualification of expert; failure to timely designate lay expert witness
159	Hearsay; foundation and qualification of expert; failure to timely designate lay expert witness
160	Authentication; hearsay
161	Authentication; hearsay
162	No objection to lease; remaining documents appear to be attached in error, as to them authentication and hearsay
163	Authentication; hearsay
165	Authentication; hearsay
167	No exhibit provided; all objections preserved
168	Authentication; hearsay
169	Authentication; hearsay
171	Authentication; hearsay
172	All rights under Rule 32 preserved
173	All rights under Rule 32 preserved
174	All rights under Rule 32 preserved
175	All rights under Rule 32 preserved; hearsay; foundation and qualification of expert

176	Need copy of transcript; hearsay; foundation and qualification of expert; failure to timely designate lay expert witness
177	Need copy of transcript; hearsay; foundation and qualification of expert; failure to timely designate lay expert witness

For the avoidance of doubt, the Defendants reserve and do not waive any objection to the testimony or opinions of Jerry M. Chang, as otherwise briefed by them, together with all of their legal arguments regarding the valuation of tort claims and assets allegedly transferred, as they have otherwise briefed.

RESPECTFULLY SUBMITTED this 18th day of March, 2024.

MUNSCH HARDT KOPF & HARR, P.C.

By: /s/ Davor Rukavina
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ATTORNEYS FOR THE DEFENDANTS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this the 18th day of March, 2024, true and correct copies of this document were electronically served by the Court's ECF system on all parties to this Adversary Proceeding through their counsel of record, including on counsel for the Trustee.

By: /s/ Davor Rukavina
Davor Rukavina, Esq.